

Deverie J. Christensen  
Nevada State Bar No. 6596  
Phillip C. Thompson  
Nevada State Bar No. 12114  
**JACKSON LEWIS P.C.**  
300 S. Fourth Street, Suite 900  
Las Vegas, Nevada 89101  
Tel: (702) 921-2460  
Email: [deverie.christensen@jacksonlewis.com](mailto:deverie.christensen@jacksonlewis.com)  
[daniel.aquino@jacksonlewis.com](mailto:daniel.aquino@jacksonlewis.com)

*Attorneys for Defendant*  
*UNLV Medicine*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MARIA ARREDONDO

Plaintiff,

vs.

UNLV MEDICINE, a nonprofit corporation;  
DOES 1 through 10; ROE ENTITIES 11  
through 20, inclusive jointly and severally,

Defendants.

Case No. 2:20-cv-01040- APG-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO FILE  
STIPULATION OF DISMISSAL AND  
PROPOSED ORDER**  
**(FIRST REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff, Maria Arredondo, (“Plaintiff”), through her counsel Burke Huber, at the Richard Harris Law Firm, and Defendant, UNLV Medicine, through its counsel, Jackson Lewis P.C., that the deadline to file a Dismissal in this case be extended to October 25, 2020.

This Stipulation is submitted and based upon the following:

1. The parties reached an agreement to settle their claims at the Early Neutral Evaluation Conference before Magistrate Judge Nancy J. Koppe on August 25, 2020. The parties were ordered to complete settlement and submit a stipulation and proposed order for dismissal no later than September 25, 2020. *See* ECF No. 25.

2. The parties' have negotiated the written settlement agreement, which has now been executed by Plaintiff. Plaintiff provided the completed W9s and tax information necessary to cut the settlement checks today, September 24, 2020. UNLV Medicine can now work on the payment, but will need time to prepare the settlement payment, deliver it to Plaintiff's counsel, and then file a Dismissal with the Court.

3. The Parties agree and request an extension of 30 days, up to and including October 25, 2020, to complete settlement payment and file the Dismissal with this Court.

4. This request is made in good faith and not for the purpose of delay.

Dated this 24th day of September, 2020.

RICHARD HARRIS LAW FIRM

/s/ Burke Huber

Richard Harris, Bar No. 505  
Benjamin Cloward, Bar No. 11087  
Burke Huber, Bar No. 10902  
801 S. Fourth Street  
Las Vegas, Nevada 89101  
*Attorney for Plaintiff*

JACKSON LEWIS P.C.

/s/ Deverie J. Christensen

Deverie J. Christensen, Bar No. 6596  
Phillip C. Thompson, Bar No. 12114  
300 S. Fourth Street, Ste. 900  
Las Vegas, Nevada 89101  
*Attorneys for Defendant*

# **ORDER**

IT IS SO ORDERED:

  
\_\_\_\_\_  
United States District Court/Magistrate Judge

Dated: September 24, 2020